

# Stevens & Lee

669 River Drive, Suite 201  
Elmwood Park, NJ 07407  
(201) 857-6760  
www.stevenslee.com

T: (201) 857-6777  
F: (610) 371-8597  
ryan.mulvaney@stevenslee.com

November 21, 2022

## **VIA ECF**

Hon. Nicholas G. Garaufis, U.S.D.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Nissan Motor Acceptance Corporation v. Nemet Motors, et al.*  
Civil Action No.: 1:19-cv-03284-NGG-CLP

This firm represents Plaintiff, Nissan Motor Acceptance Corporation now known as Nissan Motor Acceptance Company LLC (“NMAC”), in the matter referenced above. Counsel for the parties jointly submit this correspondence to advise that the parties have been working diligently in good faith to finalize a revised proposed judgment of foreclosure and sale to be submitted today pursuant to the Court’s October 27, 2022, Text Order. After a series of meet and confers including into tonight, however, the parties have encountered some logistical issues concerning the process to be set forth in the proposed judgment that the parties would like to address with the Court. The parties therefore jointly submit this correspondence to request a case management conference with the Court so that the parties may work through and conclude those logistical issues with the Court’s guidance and in conjunction with the Receiver, who the parties mutually agree should also serve as referee in the foreclosure and sale process.

Thank you.

Respectfully submitted,

STEVENS & LEE

By: /s/ Ryan P. Mulvaney  
Ryan P. Mulvaney

cc: Jeffrey C. Ruderman, Esq. (counsel for Defendants, via ECF)  
Richard P. Haber, Esq. (Court-appointed Receiver, via ECF)